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Shein Distribution Corporation,  
Roadget Business Pte. Ltd.,  
Zoetop Business Company, Limited,  
and George Chiao*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

KRISTA PERRY, an individual;  
LARISSA MARTINEZ, an  
individual; JAY BARON, an  
individual; RACHEL PFEFFER, an  
individual; DIRT BIKE KIDZ, Inc.,  
a California corporation;  
ESTELLEJOYLYNN, LLC, a New  
Jersey limited liability company;  
JESSICA LOUISE THOMPSON  
SMITH, an individual; LIV LEE, an  
Individual,

Plaintiffs,

v.

SHEIN DISTRIBUTION  
CORPORATION, a Delaware  
corporation; ROADGET BUSINESS  
PTE., LTD; ZOETOP BUSINESS  
CO., LTD.; SKY XU, a/k/a CHRIS  
XU, and GEORGE CHIAO.

Defendants.

Case No. 2:23-cv-05551-MCS-JPR

Assigned to: Hon. Mark C. Scarsi

**JOINT STIPULATION TO AMEND  
COUNT IX OF PLAINTIFFS' THIRD  
AMENDED COMPLAINT**

Complaint filed: July 11, 2023

TAC filed: April 15, 2024

1 This Stipulation is made and entered into by and among Plaintiffs Krista Perry,  
2 Larissa Martinez, Jay Baron, Rachel Pfeffer, Dirt Bike Kidz, Inc., Estellejoylynn,  
3 LLC, Jessica Louise Thompson Smith, and Liv Lee (collectively, “Plaintiffs”) and  
4 Defendant George Chiao (“Mr. Chiao,” and together with Plaintiffs, the “Parties”),  
5 through their respective counsel, with reference to the following:

6 WHEREAS, Plaintiffs filed their Third Amended Complaint (“TAC”) on April  
7 15, 2024, which added Mr. Chiao as a named defendant and asserted twelve claims  
8 for relief against him, including Count IX for Removal of Copyright Management  
9 Information in Violation of the Digital Millenium Copyright Act (“Count IX”) (ECF  
10 No. 52);

11 WHEREAS, on June 17, 2024, Mr. Chiao filed a Motion to Dismiss Plaintiffs’  
12 TAC, which sought to dismiss all claims Plaintiffs asserted against him, including  
13 Count IX (“Mr. Chiao’s Motion to Dismiss”) (ECF No. 62);

14 WHEREAS, on November 8, 2024, the Court entered an order (“Order”)  
15 granting in part Mr. Chiao’s Motion to Dismiss with respect to Counts I-VIII and X-  
16 XI, denying Mr. Chiao’s Motion to Dismiss with respect to Counts IX and XII, and  
17 granting Plaintiffs leave to file a further amended complaint within 14 days of the  
18 Order (ECF No. 70);

19 WHEREAS, on November 20, 2024, the Parties met and conferred pursuant  
20 to Local Rule 7-3 to discuss Mr. Chiao’s intent to file a motion for reconsideration  
21 of the Order with respect to Count IX only;

22 WHEREAS, Count IX is a claim for Removal of Copyright Management  
23 Information in Violation of the Digital Millennium Copyright Act (17 U.S.C  
24 1202(b)) (the “DMCA Claim”) asserted by Plaintiff Estellejoylynn, LLC against all  
25 Defendants;

26 WHEREAS, Plaintiffs do not concede or agree that there is any basis for Mr.  
27 Chiao’s stated intended motion for reconsideration of the Order with respect to Count  
28 IX;

1 WHEREAS, the Parties have agreed that to preserve the Court's and the  
2 Parties' resources, in lieu of Mr. Chiao filing a motion for reconsideration, and  
3 without making any other change to the TAC or the claims asserted therein, and  
4 without prejudice to assertion of the DMCA Claim, or any other claim, Plaintiff  
5 Estellejoylynn, LLC will withdraw Count IX against Mr. Chiao only and the Parties  
6 will deem the TAC amended so that Count IX is no longer asserted against Mr. Chiao,  
7 but remains pending against all defendants other than Mr. Chiao.

8 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and  
9 among the Parties, as follows:

10 1. Plaintiff Estellejoylynn, LLC agrees to withdraw Count IX against Mr.  
11 Chiao only;

12 2. Plaintiffs' TAC is deemed amended so that Count IX (TAC ¶¶ 186-193)  
13 is no longer asserted against Mr. Chiao, but remains pending against all other  
14 defendants;

15 3. Nothing in this stipulation shall be construed as a waiver of any of  
16 Plaintiffs' or Defendants' rights or defenses.

17 IT IS SO STIPULATED.

18  
19 DATED: November 22, 2024 PAUL HASTINGS LLP

20 By: /s/ Ali R. Rabbani  
21 Ali R. Rabbani

22 *Attorneys for Defendants*

23 DATED: November 22, 2024 WOOLLS PEER DOLLINGER & SCHER

24  
25 By: /s/ Antoinette Waller  
26 Antoinette Waller

27 *Attorneys for Plaintiffs*  
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**ATTESTATION**

Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filing party hereby attests that all signatories listed concur in this filing's content and have authorized this filing.